



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Karen Johnson, Treasurer
Pioneer Political Action Committee
499 S. Capitol Street, SW, Suite 506
Washington, DC 20003

JAN 13 1999

Identification Number: C00325357

Reference: 12 Day Pre-General Report (10/1/98-10/14/98)

Dear Ms. Johnson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): "consulting". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule B of your report discloses "in-kind" transactions involving Jet Systems Inc., Marriott Suites-Newport Beach, and the Four Seasons Biltmore-Santa Barbara (pertinent portions attached). 2 U.S.C. § 441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Please amend your report to provide clarification regarding these transactions.

-Your report discloses a payment(s) on Schedule D to the Monocle on Capitol Hill and National Car Rental, which has not been recorded on a disbursement schedule. Debt payments must be reflected on Schedule B as well as on Schedule D. Please amend your report to clarify this discrepancy. 2 U.S.C. §434(b)(5)(D)

A written response or an amendment to your original report(s) correcting the above